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Counsel for Debtor

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re: Karen S. Nicholson

Case No. 12-34064
Chapter 13
Trustee: Robert E. Hyman

NOTICE OF MOTION AND MOTION FOR AUTHORITY TO INCUR DEBT

The above named Debtor has filed a Motion for Authority to Incur Debt Secured by Personal Property in this bankruptcy case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one.

Under Local Bankruptcy Rule 9013-1, unless a written response to this motion and supporting memorandum are filed with the Clerk of Court and served on the moving party within twenty (21) days of the service of this notice objecting to the relief requested, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing. If you want to be heard on this matter, on or before twenty (21) days from the date of service of the attached Motion, you or your attorney must:

1. File with the court, at the address below a written response pursuant to Local Bankruptcy Rules 9013-1(H). Unless a written response is filed and served by the date specified, the court may decide that you do not oppose the motion. If you mail your response to the court for filing, you must mail it early enough so that the court will receive it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 E. Broad Street, Rm. 4000
Richmond, VA 23219

2. You must also mail a copy to:

Nupa Agarwal
Attorney at Law
PO Box 17275
Richmond, VA 23226

If you or your attorney do not take these steps, the court may decide that you not oppose the relief sought in the Motion and may enter an order granting that relief.

Dated: July 23, 2014

Nupa Agarwal, Attorney at Law
Counsel for Debtor
/s/ Nupa Agarwal

CERTIFICATE

I hereby certify that on July 23, 2014, I mailed the Motion to Incur Debt for a Car, Notice of Motion to Incur Debt by mail, postage pre-paid to: the Debtor Karen S. Nicholson, 3901 Dunraven Road, Richmond, VA 23236; the U.S. Trustee, 701 E. Broad Street, Suite 4304, Richmond, VA 23219, the Chapter 13 Trustee and all creditors and parties of interest herein.

/s/ Nupa Agarwal, Esq.
Nupa Agarwal

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MOTION TO INCUR DEBT

COMES NOW, Debtor Karen S. Nicholson, by counsel and respectfully makes Motion for Authority to Incur Debt in order to purchase a vehicle. In support thereof, Debtor states the following:

1. On or about July 9, 2012, the Debtor filed a Voluntary Petition for relief under Chapter 13 of the United States Bankruptcy Code pursuant to the provisions of 11 U.S.C. Section 362.

2. The Chapter 13 plan has been confirmed. Per Robert Hymans Access 13 Debtor is Current on her Chapter 13 Payments.

3. Debtor wishes to purchase a new or used vehicle. The Debtor has obtained an offer from a proposed lender for a loan to be secured by a lien on the vehicle. The terms of the proposed loan are as follows:

- a. The price of the vehicle is not to exceed \$35,000.00
- b. A fixed interest rate which is not to exceed 12.99%
- c. The term of the loan is not to exceed 72 months
- d. The payments will not be greater than \$700.00 per month.

4. The purchase of the vehicle is necessary because the Debtor needs another car for the family. The debtor's children are now driving and they are in need of another safe vehicle to get everybody in the family where they need to be.

5. HEREOF the Debtor requests an Order permitting the Debtor to purchase a vehicle as set forth herein, and for such other and further relief to which Debtor may show herself entitled.

Respectfully submitted:

By: /s/ Karen S. Nicholson

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/s/ Nupa Agarwal, Esq.
Nupa Agarwal

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Acs/Absolute Collection Service
421 Fayetteville St Ste 600
Raleigh, NC 27601

Ballato Law Firm, P.C.
3721 Westerre Parkway, Suite A
Henrico, VA 23233

Bristol Home Mortgage Lending
7251 W. Palmetto Park Road
Suite 301
Boca Raton, FL 33433

Cashnet USA
200 W. Jackson Blvd
Ste 1400
Chicago, IL 60606

Chesterfield County Gen Dist.
9500 Courthouse Road
P.O. Box 144
Chesterfield, VA 23832

Dept Of Education/neln
121 S 13th St
Lincoln, NE 68508

Enhanced Recovery Corp
Attention: Client Services
8014 Bayberry Rd
Jacksonville, FL 32256

Focused Recovery Solut
9701 Metropolitan Ct Ste
North Chesterfield, VA 23236

Glasser and Glasser
PO Box 3400
Norfolk, VA 23514

Hilco Receivables/Equable Ascent Financi
Attn: Bankruptcy
1120 Lake Cook Road Suite B
Buffalo Grove, IL 60089

Midland Funding
8875 Aero Dr
San Diego, CA 92123

New City Funding Corp
146 S Liberty Dr Ste B3
Stony Point, NY 10980

Nina J. Cox
3721 Westerre Parkway
Suite A
Henrico, VA 23233

Portfolio Rc
Attn: Bankruptcy
Po Box 41067
Norfolk, VA 23541

Rubenstein Cogan and Revesman
12 South Summit Avenue
Suite 250
Gaithersburg, MD 20877

Santander Consumer Usa
Po Box 961245
Ft Worth, TX 76161

Select Portfolio Servicing
PO Box 65250
Salt Lake City, UT 84165

Vericrest
Po Box 24610
Oklahoma City, OK 73124